

### REMARKS

The Office Action mailed June 6, 2002 and the references cited therein have been carefully considered. Applicants have amended independent claims 1, 5, 21 and 24, and the application still contains claims 1-25. Inasmuch as no new claims were added, no new fee is required.

In the aforesaid Office Action, the Examiner has rejected claims 1, 2, 5-7, 21, 22 and 24 as being directly anticipated within the meaning of 35 U.S.C. §102 by Barnett et al (U.S. Patent No. 6,336,099). Claims 3, 4, 8-13, 23 and 25 were objected to as being dependent upon a rejected base claim; however, the Examiner indicated such claims would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

Claim 1 has been amended to more clearly define the patentable features of the present invention and now recites:

1. A system for distributing and printing packets of information to individuals at selected retail locations upon request by said individuals, said system including:
  - means for creating said packets of information in a digital format;
  - a wireless network for transmitting said packets of information to said retail locations; and
  - a network of dedicated, standardized high-speed printer appliances at said retail locations, each of said appliances being adapted to:
    - receive said transmitted packets of information from said wireless network;
    - process and store selected packets of information from all those received;
    - convert said selected packets of information into a printable format for distribution to said individuals;
    - receive and process a request to print said packets of information by said individuals;
    - automatically print said selected packets in response to said request; and
    - prevent misuse and unauthorized copying of said packets of information.

It will be appreciated that the system of claim 1, amended, offers numerous advantages over the prior art in that it provides a totally wireless system for conveying packets of information to a retail establishment such as a grocery store where printed packets are automatically dispensed to customers on a network of standardized, high-speed printers. The prior art relied upon by the Examiner neither teaches or suggests such a unique combination.

The patent to Barnett et al. (U.S. Patent No. 6,336,099) cited by the Examiner invention describes an apparatus for the delivery of coupons to individuals at their homes using their personal computers and whatever printer or printers are attached thereto. Such system allows a user at home to select from one or more potential coupons using his or her personal computer, and printer these coupons on their personal printer, which coupons are then taken to a retail location such as a store for redemption.

As can be appreciated by claim 1, as amended, the function and purpose of the Barnett system is entirely different from that of applicants' system. First and foremost, applicants' system allows users to select and print the coupons at the retail location, using one or more of the printer appliances at said location to print. This system allows for the controlled distribution of coupons based upon a consumer's order, which order may be placed at the consumer's home using a personal computer. The printing, however, occurs at the retail location, thereby ensuring the security and integrity of the coupon distribution.

Applicants' respectfully disagree with the Examiner's contention that the personal computer 6 of Barnett may be interpreted as a "retail location." There is no teaching nor suggestion in Barnett that the printer and the personal computer would even be at separate locations, let alone having a standardized, high speed printer being located at a retail establishment such as a grocery store. As applicants will demonstrate, there is a fundamental

difference between having a standardized, high-speed printer appliance located at a retail establishment and using a personal computer and attached printer for printing out coupons.

It should be appreciated that applicants' printer appliances are all standardized, high-speed printers designed specifically for printing out coupons. The printers used by the system in Barnett, aside from the fact that they are not located at the retail establishments, are not so designed. In fact, printers exist with a wide range of performance characteristics, and most personal computer owners use the most affordable printer, which printers often have low-end performance characteristics. As a result the coupons generated can have widely different physical appearances depending upon the particular printer hardware and software configurations. Some could possibly be in color, in various font types or sizes, with vastly different graphics quality dependent upon the printer resolution, and on different quality or different color paper stock.

The system described in Barnett is not particularly suited for the distribution of discount coupons, which are essentially virtual currency and by necessity require tight security controls to ensure proper use. A standardized format unique to a particular offer is a mandatory requirement imposed by coupon issuing manufacturers. It is easy to imagine the difficulties we would have with currency if, for example, we allowed distribution of dollar bills with different sizes, colors, paper stock etc.

As has been discussed, in applicants' system, a personal computer is used only by a consumer to access the promotion web-site and select coupons of interest. By design it is not used to print coupons. A user places an order and selects one or more stores where he or she can pick up the coupons. On entering the store, the consumer, enters the issued order number at the coupon dispenser terminal, which immediately prints high quality, aesthetic coupons with

readable bar codes. The dispenser automatically erases the order on verification of the order number such that only one copy of the order can be filled.

No coupon selection is made at the terminal since minimizing attendance time is of critical concern. The selection process is time consuming and customers will be deterred from using the appliance if lines form.

The dispensing terminal is cloned such that identically performing units can be placed in any other store anywhere. This ensures that a coupon, depicting a particular offer will have identical form and feature no matter which actual dispenser issues the coupon. In stark contrast to Barnett, the dispenser of applicants' system must be equipped with a high performance printer, having a high page print rate, high resolution print quality, full color capability, and high volume paper storage and transport capability since it must serve a continuous stream of users with minimal delays.

In addition, other problems exist if the conventional home PC as referred by Barnett is used in printing the coupons. For example, applicants' printer appliances are high quality printers with premium performance characteristics specifically designed to consistently print UPC bar-codes that require high print definition. Most conventional bar code printers are usually of a special class that use thermal print-heads or laser writing mechanisms that ensures the consistency and readability of the UPC bar-codes. The most common consumer printer, as is required by Barnett, is of the ink-jet variety that has marginal print definition for maintaining precision bar code dimensions and uses slow drying ink that can easily smear and destroy the bar-code integrity. Coupons that cannot be scanned at a check out register are an extreme irritant to the retailer who will frequently surcharge the manufacturer if coupons are not readable.

In addition, since most home personal computers access the Internet with a landline,

having at best a bandwidth of 56 kilobytes, downloading graphics files for composing aesthetic coupon images ends up being a severe exercise in patience. In contrast, the coupon dispenser of the present invention can be fitted with a high speed communications link that downloads rapidly. Moreover, the dispenser can have superior processing capability than the average PC, and may be fitted with a coupon composition component in which common image content, such as redemption terms and conditions, coupon face values, and brand names may be stored locally and do not need to be transferred via a remote communications link.

In addition, the printer appliance of the present invention is specifically designed and includes composition features to format and print coupons, which are usually about 2.5 inches wide and 6 inches long. The system described in Barnett offers no composition aids, requiring the user to trim the coupon prior to use. The paper stock used in all of applicants' dispensers may be standardized in terms of paper characteristics such that the form and feel of each dispensed coupon is identical. Additional security can be imposed by including batch production numbers to the reverse printing.

Furthermore, single side printing allows coupons to be produced en masse off regular and readily available copying machines particularly if monochrome coupons are allowed. Manufacturers rarely issue single face printed coupons because of the abuse potential. In applicants' system, the paper stock may be preprinted on the reverse side with a colored cautionary message concerning copying of the coupon and warning about misuse.

Coupon abuse is a serious flaw inherent in the Barnett system. Using a home personal computer, a coupon image can be readily carried over into a conventional publishing software program either by internal file transfer or by reloading via a scanner. Once transferred, the coupon image can be manipulated at will, especially in the privacy of one's home. The face value

could be changed, bar codes modified, user ID altered etc. by individuals with fairly common computer skills. Home issuance of coupons on PC's poses real problems with security. In applicants' invention the user has only controlled access to the dispenser, which, in any case has no local image editing capability for manipulating images. It is significant that the dispenser is prominently positioned within a store. Activity at the dispenser is highly visible, which will deter the occurrence of attempted devious practices.

Another factor that clearly differentiates between a personal computer and a retailer installed coupon dispenser is the radical change to the purchase impulse delivered to the consumer. While the system of Barnett does overcome some of the inherent problems that affect the redemption rate of a particular promotion, the system offers no certain way that the coupon is at hand on the actual shopping trip. In the system described in the present invention, the coupons are issued on a dedicated coupon dispenser located within the store where the actual coupons are on hand. Even on an impromptu, unplanned shopping trip the consumer can enter his or her ID and have printed immediately all coupons that he or she has previously ordered. Such system permits downloading of coupons to multiple locations, but ensures that each coupon is printed a single time. Clearly, a consumer with coupon in hand, and in close vicinity to the stocked product, is much more positively persuaded to take advantage of the offer compared to the system described in Barnett where the coupon printed at home may or may not be available at the time of purchase.

In light of these amendments and remarks, applicants submit that claim 1, amended, now patentably distinguishes over the Barnett et al. patent since it neither teaches nor suggests the use of a wireless network that broadly transmits packets of information to a network of standardized, high-speed printer appliance located at retail establishments, which appliances receive,

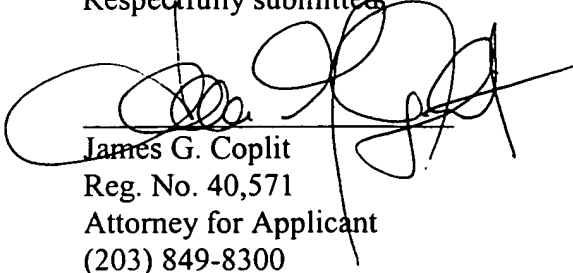
selectively process, and print only those packets intended for such appliance upon the demand of the consumer, while preventing fraud and abuse, such as printing multiple coupons or modifying the content of the coupons.

Accordingly, applicants submit that claim 1, amended, patentably distinguishes over all of the references cited by the Examiner, taken alone or in combination, and is condition for immediate allowance.

Claims 2-4 depend from and further restrict claim 1, amended, and applicants submit that these claims likewise distinguish over these references for the same reason as claim 1, amended. Independent claims 5, 21 and 24 have been amended in the same manner as claim 1, amended, to more clearly identify the patentable features of the invention. Applicants submit that in view of these amendments, these claims and all claims that depend from and further restrict them, patentably distinguish over the references of records, whether taken alone or in combination, and are also in condition for immediate allowance.

In view of the foregoing, applicants submit that all claims are in condition for immediate allowance. Reconsideration and an early Notice of Allowance are therefore requested. In the event that the Examiner should determine that the aforesaid Amendment does not place the case in condition for immediate allowance, the Examiner is invited to contact the undersigned attorney by telephone to discuss what additional steps would be necessary to immediately place the case in condition for allowance.

Respectfully submitted,



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**CLEAN VERSION OF AMENDED CLAIMS:**

1. A system for distributing and printing packets of information to individuals at selected retail locations upon request by said individuals, said system including:

means for creating said packets of information in a digital format;

a wireless network for transmitting said packets of information to said retail locations;

and

a network of dedicated, standardized high-speed printer appliances at said retail locations, each of said appliances being adapted to:

receive said transmitted packets of information from said wireless network;

process and store selected packets of information from all those received;

convert said selected packets of information into a printable format for distribution to said individuals;

receive and process a request to print said packets of information by said individuals;

automatically print said selected packets in response to said request; and

prevent misuse and unauthorized copying of said packets of information.

5. A system for distributing packets of information to individuals at selected retail locations upon request by said individuals, said system including:

means for creating said packets of information in digital format;

means for identifying intended recipients of said packets of information;

means for establishing a sequence of distribution of said packets of information;



a wireless network for transmitting said packets of information to said retail locations;  
and  
a network of dedicated, standardized high-speed printer appliances at said retail locations,  
each of said appliances being adapted to:

- receive said transmitted packets of information from said wireless network;
- process and store selected packets of information from all those received;
- convert said selected packets of information into a printable format for distribution to said individuals;
- receive and process a request to print said packets of information by said individuals;
- automatically print said selected packets in response to said request; and
- prevent misuse and unauthorized copying of said packets of information.

21. A method for distributing packets of information to individuals at selected retail locations upon request by said individuals, said method including the steps of:

- creating said packets of information in a digital format;
- transmitting said packets of information to a network of dedicated, standardized high-speed printer appliances at said retail locations over a wireless network;
- receiving said transmitted packets of information from said wireless network at selected appliances;
- processing and storing selected packets of information from all those received;
- converting said selected packets of information into a printable format for distribution to said individuals;

receiving and processing a request to print said packets of information by said individuals;

automatically printing said selected packets in response to said request; and  
preventing misuse and unauthorized copying of said packets of information.

24. A method for distributing redeemable retail coupons to individuals at selected retail locations, said method including:

creating said coupons in a digital format;

transmitting said coupons to a network of dedicated, standardized high-speed printer appliances at said retail locations over a wireless network;

receiving said transmitted coupons from said wireless network at selected appliances;

processing and storing selected packets of information from all those received;

converting said coupons into a printable format for distribution to said individuals;

automatically printing said selected packets;

receiving and processing a request to print said packets of information by said individuals;

automatically printing said selected packets in response to said request;

preventing misuse and unauthorized copying of said packets of information; and

detecting the removal of a printed coupon from said appliance and thereafter  
automatically printing an additional coupon for distribution.